

EXHIBIT C

EXHIBIT A

EXHIBIT A: RESOLUTION STATISTICS IN MULTI-DISTRICT LITIGATIONS*

Product Name	MDL Number	Description	Company	Claimed Injuries	Approx. Number of Settling Claimants	Overall Settlement Amount	Approx. Mean Settlement Amount Per Claimant	Example Sources
Actos	2299	Type II diabetes	Takeda & Eli Lilly	Bladder cancer	9,000	\$2.4B	\$266,667	https://www.drugwatch.com/actos/lawsuits/
Apogee Perigee	2325	Pelvic mesh	Endo / American Medical Systems	Pain, infection, surgical removals / revisions	48,000 22,000 20,000	\$2.8B \$775M \$830M	\$58,333 \$35,227 \$41,500	https://www.drugwatch.com/news/2017/08/09/endo-announces-775m-settlement-for-transvaginal-mesh-claims/ https://www.drugwatch.com/news/2014/05/01/ams-settles-830m-vaginal-mesh-lawsuit/
Benicar	2606	High blood pressure	Daiichi-Sanyo	Enteropathy	2,300	\$300M	\$130,435	https://www.reuters.com/article/us-daiichi-sankyo-lawsuit/daiichi-sankyo-settles-u-s-lawsuits-over-blood-pressure-drug-benicar-idUSKBN1AH4V9/
Chantix	2092	Anti-Smoking	Pfizer	Suicide and other psychiatric disturbances	2,160	\$273M	\$126,389	https://www.fiercepharma.com/sales-and-marketing/pfizer-settles-2-000-plus-chantix-suits-takes-273m-charge
Coloplast	2387	Pelvic mesh	Coloplast Corporation	Pain, infection, surgical removals / revisions	400	\$16M	\$40,000	https://news.bloomberglaw.com/pharma-and-life-sciences/coloplast-said-to-pay-16-million-to-settle-some-400-pelvic-mesh-cases
Combat Arms Earplug	2885	Earplug	3M	Hearing loss and tinnitus	250,000	\$6B	\$24,000	https://www.flnd.uscourts.gov/3m-products-liability-litigation-mdl-no-2885
Essure	2739	Contraceptive implant	Bayer	Pain, perforation, ectopic pregnancy, bleeding, surgical removals, auto immune	35,100	\$1.6B	\$45,584	https://www.reuters.com/article/business/bayer-to-pay-1-6-billion-to-resolve-u-s-claims-for-essure-birth-control-device-idUSKBN25G252/
Fosamax	1789	Osteoporosis	Merck	Jaw and femur fractures	1,200	\$27.7M	\$23,083	https://www.drugwatch.com/fosamax/lawsuits/
GranuFlo/ Naturallyte	2428	Dialysis	Fresenius Medical Care	Cardiac arrest	10,000	\$250M	\$25,000	https://www.nytimes.com/2016/02/19/business/dialysis-equipment-maker-settles-lawsuit-for-250-million.html
Kugel Mesh	1842	Hernia patch	Davol/Bard	Various painful, life-threatening, and potentially fatal complications	2,700	\$184M	\$68,148	https://www.robertkinglawfirm.com/personal-injury/hernia-mesh-lawsuit/
Mirena	2767	Contraceptive hormone releasing IUD	Bayer	Perforations	4,600	\$12.2M	\$2,652	https://today.westlaw.com/Document/Ied28b040399111ebb3c1929a5b9ad316/View/FullText.html?transitionType=Default&contextData=(sc.Default)&firstPage=true
Nexium Prilosec	2404	Proton-pump inhibitor (PPI); treats heart burn / stomach acid	AstraZeneca	Kidney injuries	11,000	\$425M	\$38,636	https://www.reuters.com/legal/astrazeneca-pay-425-mln-settle-nexium-prilosec-litigation-us-2023-10-03/
Nuvaring	1964	Contraceptive	Merck	Strokes, heart attacks, blood clots	3,610	\$100M	\$27,700	https://www.law360.com/articles/507908/merck-to-pay-100m-to-end-nuvaring-blood-clot-suits
Pradaxa	2385	Blood thinner	Boehringer Ingelheim	Bleeds / strokes	4,100	\$650M	\$158,537	https://www.drugwatch.com/pradaxa/lawsuits/
Prempro	1507	Hormone replacement therapy (HRT)	Wyeth / Pfizer	Breast cancer	6,000 4,000	\$896M \$330M	\$149,333 \$82,500	https://www.aboutlawsuits.com/prempro-settlement-payments-breast-cancer-29138/
Propecia	2331	Male pattern hair loss	Merck	Erectile dysfunction	562	\$4.3M	\$7,651	https://www.drugwatch.com/propecia/lawsuits/
Seroquel	1769	Antipsychotic	AstraZeneca	Diabetes	6,000 17,500	\$150M \$200M	\$25,000 \$11,429	https://www.aboutlawsuits.com/seroquel-settlement-16354/
Vioxx	1657	Painkiller	Merck	Cardiac arrest and stroke	60,000	\$4.85B	\$80,833	https://www.drugwatch.com/vioxx/lawsuits/

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Product Name	MDL Number	Description	Company	Claimed Injuries	Approx. Number of Settling Claimants	Overall Settlement Amount	Approx. Mean Settlement Amount Per Claimant	Example Sources
Wright Medical	2329	Hip Implant	Wright Medical	Metallosis and tissue and bone damage	1,292 600	\$240M \$90M	\$185,759 \$150,000	https://www.drugwatch.com/hip-replacement/wright-medical/
Xarelto	2592	Blood thinner	Bayer & J&J	Bleeds / strokes	25,000	\$775M	\$31,000	https://www.reuters.com/article/business/bayer-jj-settle-thousands-of-us-xarelto-lawsuits-for-775-million-idUSKCN1R61UD/
Yaz Yasmin	2100	Contraceptive medicine	Bayer	Blood clots, strokes, gallbladder problems	10,300 1,200 7,200	\$2.04B (blood clots) \$56.9M (heart attack / stroke) \$21.5M (gallbladder)	\$198,058 \$47,417 \$2,986	https://www.drugwatch.com/yaz/settlements/
Zantac	2924	Heartburn medicine	GSK	Cancer	80,000	\$2.2B	\$27,500	https://www.gsk.com/en-gb/media/press-releases/statement-zantac-ranitidine-litigation-settlement-agreements-reached/

*This chart includes resolution statistics for the listed products from both within and outside of the listed MDLs.